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7 Attorney for Adrian Isaiah Quebec

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ADRIAN ISAAH QUEBEC,
15 Defendant.

Case No. 2:23-mj-00012-BNW

**STIPULATION TO CONTINUE
PRELIMINARY HEARING**
(First Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Bianca R. Pucci, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Heather Fraley, Assistant Federal Public Defender, counsel for Adrian Isaiah Quebec, that the
21 Preliminary Hearing currently scheduled on January 23, 2023, be vacated and continued to a
22 date and time convenient to the Court, but no sooner than ninety (90) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties are currently involved in negotiations to resolve this matter pre-
25 indictment. If this case ultimately does go to preliminary hearing or trial, the parties need
26 additional time to review discovery and effectively prepare for the hearing or trial.

2. The defendant is not in custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested herein is not sought for purposes of delay, but to allow parties to negotiate.

6. The additional time requested by this stipulation, is allowed, with the defendant's consent under the Federal Rules of Procedure 5.1 (d).

7. The additional time requested by this stipulation is excludable in computing the time within which the defendant must be indicted and the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the factors under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

This is the first request for a continuance of the preliminary hearing.

DATED this 13th day of January 2023.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Heather Fraley
By _____

/s/ Bianca R. Pucci
By _____

HEATHER FRALEY
Assistant Federal Public Defender

BIANCA R. PUCCI
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ADRIAN ISALAH QUEBEC,

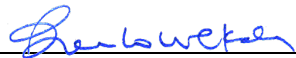
7 Defendant.
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Case No. 2:23-mj-00012-BNW

ORDER

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10 IT IS THEREFORE ORDERED that the preliminary hearing currently scheduled for
11 Monday, January 23, 2023 at 1:30 p.m. be vacated and continued to April 24, 2023 at 2:30 p.m.
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13 DATED: January 18, 2023.

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16 UNITED STATES MAGISTRATE JUDGE
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